

**AFFIDAVIT IN SUPPORT OF THE ISSUANCE
OF A CRIMINAL COMPLAINT**

Your affiant, Clarissa Smith, being duly sworn, states the following:

INTRODUCTION

1. Your affiant is a Special Agent with the Federal Bureau of Investigation (“FBI”) and has been so employed in that capacity since July 2017. Your affiant is currently assigned to the Monroe Resident Agency of the New Orleans Division. Your affiant has received training in a variety of investigative and legal matters, including the drafting of search warrant affidavits and affidavits for the issuance of criminal complaints.

2. Your affiant is familiar with the circumstances of the offenses described in this Affidavit through a combination of personal knowledge of the facts, discussion with other law enforcement officials, and other investigative activities conducted throughout the investigation.

3. Your affiant respectfully makes this Affidavit in support of an application for the issuance of a criminal complaint and arrest warrant for **GARY LANDON HARPER, JR.** (“HARPER”), for violations of Title 18, United States Code, Sections 2251(a): production of child pornography; 2252A(a)(2)(A): receipt of child pornography; 2252A(a)(5)(B): possession of child pornography; and 2422(b): coercion and enticement. This Affidavit does not include all facts known to your affiant, but contains such facts reasonable and necessary to establish probable cause for the issuance of a criminal complaint and arrest warrant.

PROBABLE CAUSE

4. **HARPER** is 31 years old and resides in Bastrop, Louisiana.

5. On or about August 30, 2021, the Monroe Police Department contacted the Ouachita Parish Sheriff's Office regarding a complaint from a 16-year-old juvenile ("VICTIM 1") who had recently met **HARPER** on the social media application known as "Snapchat."

6. Snapchat allows users to send and receive digital images and videos that are only available for a certain period of time (as established by the sender) before they automatically delete and disappear from view. Senders and receivers of these images and videos, however, may save them by either "screenshotting" them to their cellular telephone's camera roll or by using a feature called "Snapchat Memories" which allows users to save them within their Snapchat account. Snapchat also has an instant messaging interface that allows users to send and receive direct messages that contain photos, videos, and money using the mobile payment service "Cash App." Snapchat users may decorate their photos or videos with filters, stickers, and other labels, and may also select their individual user name to be displayed on their Snapchat account.

7. Some of **HARPER**'s known Snapchat user names were "OleHarp" and "LilHarp."

8. **HARPER** engaged **VICTIM 1** in multiple conversations over Snapchat, and eventually coerced **VICTIM 1** into meeting him in person. After the two met, **HARPER** eventually paid **VICTIM 1** \$150 in exchange for sex.

9. During interviews with investigators, **VICTIM 1** stated that **HARPER** recorded this sex act on his cellular telephone. **VICTIM 1** also informed investigators that they had asked **HARPER** if he had deleted the video and **HARPER** claimed that he had not.

10. **VICTIM 1** also stated that **HARPER** claimed he was 20 years old. **VICTIM 1** recounted that **HARPER** had requested that **VICTIM 1** tell him over Snapchat that **VICTIM 1** was 18 years old. **VICTIM 1** believed **HARPER** made such a request “so he wouldn’t get in trouble.”

11. Based upon **VICTIM 1**’s initial complaint, **HARPER** was arrested on September 2, 2021 by the Monroe Police Department and charged with felony carnal knowledge of a juvenile. Following his arrest, **HARPER**’s cellular telephone was seized by authorities. Police then applied for and received a search warrant from the Fourth Judicial District Court for the contents of **HARPER**’s cellular telephone.

12. Investigators reviewed the contents of **HARPER**’s cellular telephone and found digital images and video recordings of **HARPER** performing sex acts on **VICTIM 1**.

13. In addition to the digital images and video recordings of **VICTIM 1** on **HARPER**’s cellular telephone, investigators also discovered digital images and video recordings of a 15-year-old juvenile (“**VICTIM 2**”) not previously known to authorities.

14. On October 19, 2021, investigators interviewed **VICTIM 2** and learned that between June and July 2021 they had met **HARPER** over Snapchat just like

VICTIM 1. **HARPER** engaged **VICTIM 2** in multiple conversations over the application, and eventually coerced **VICTIM 2** into meeting him in person. After the two met, **HARPER** eventually paid **VICTIM 2** \$100 in exchange for sex. **VICTIM 2** stated that they had sex with **HARPER** approximately six (6) times.

15. Investigators also learned that **HARPER** coerced **VICTIM 2** to provide him with their login information for their Snapchat account. With access to **VICTIM 2**'s Snapchat account, **HARPER** was able to obtain an explicit video and digital image of **VICTIM 2**. That digital image depicts **VICTIM 2** completely undressed and displaying both her breasts and vagina. The video depicts **VICTIM 2** masturbating. Both the digital image and video were recovered from **HARPER**'s cellular telephone during the execution of the search warrant.

16. **VICTIM 2** also told investigators that when they first met **HARPER** in person, **HARPER** informed **VICTIM 2** that he knew **VICTIM 2** was only 15 years old. **HARPER** then told **VICTIM 2**, "it's okay, I'm 18. I know it's an age difference, but it should be okay." Investigators also found saved on **HARPER**'s cellular telephone a digital image from Snapchat depicting **VICTIM 2** that was labeled with **VICTIM 2**'s age (15) and where **VICTIM 2** went to high school.

CONCLUSION

Based upon the facts set forth in this Affidavit, your affiant respectfully asserts that probable cause exists that **HARPER** has violated Title 18, United States Code, Sections 2251(a): production of child pornography; 2252A(a)(2)(A): receipt of child pornography; 2252A(a)(5)(B): possession of child pornography; and 2422(b):

coercion and enticement, and respectfully requests that this Honorable Court issue a complaint and arrest warrant for HARPER.


CLARISSA SMITH
Special Agent, FBI

Subscribed and sworn to before me on this 22nd day of October, 2021, in Monroe, Louisiana, and I find probable cause for the issuance of a complaint and arrest warrant.




HON. LAYLA D. MCCLUSKY
United States Magistrate Judge